

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:) Case No. 18-15368
Eugenio Ferrer) Chapter 13
) Judge: Pamela S. Hollis
Debtor)
)

NOTICE OF MOTION AND CERTIFICATE OF SERVICE

Eugenio Ferrer
411 Lennox Dr
Oswego, IL 60543

CHERNY LAW OFFICES PC
111 E JEFFERSON AVE
NAPERVILLE, IL 60540

Please take notice that on August 10, 2018 at 11:30 am, a representative of this office shall appear before the Honorable Judge Pamela S. Hollis, at the Joliet City Hall, 150 West Jefferson Street, 2nd Floor, Joliet, IL 60432 and present the motion set forth below. **Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

I certify that this office caused a copy of this notice to be delivered to the above listed debtor by depositing it in the U.S. Mail at 801 Warrenville Road, Lisle, IL and to the debtor's attorney electronically via the Court's CM/ECF system on July 31, 2018.

/s/ Gerald Mylander

FOR: Glenn Stearns, Chapter 13 Trustee

MOTION TO DISMISS FOR UNREASONABLE DELAY AND FAILURE TO MAKE PLAN PAYMENTS

Now comes Glenn Stearns, Chapter 13 Trustee, and requests dismissal of the above case pursuant to 11 U.S.C. Section 1307 (c) and in support thereof, states the following:

1. The Debtor filed a petition under Chapter 13 on Tuesday, May 29, 2018.
2. The Debtor has failed to:
 - a. File an amended plan.
 - b. Provide income documentation.
 - c. Commence making timely plan payments.
3. As a result, the Debtor has failed to comply with the Bankruptcy Code and has caused an unreasonable delay that is prejudicial to creditors.

WHEREFORE, the Trustee prays this case be dismissed for cause pursuant to Section 1307 (c).

Respectfully Submitted;

/s/ Gerald Mylander

FOR: Glenn Stearns, Chapter 13 Trustee

Glenn Stearns, Chapter 13 Trustee
801 Warrenville Road, Suite 650
Lisle, IL 60532-4350